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November 3, 2017

**VIA ECF**

Honorable LaShann DeArcy Hall  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Wilda Rios, et al., v. City of New York, et al.  
17 CV 2840 (LDH) (RER)

Your Honor:

I am writing to oppose the City's request for an interim stay of documentary discovery pending the motion conference.

First, it seems both inconsistent and unfair, I submit, for the City to request the stay of documentary discovery when the City itself served interrogatories and requests for documents on October 3, 2017 (which Plaintiffs have fully responded to).

Second, as noted in my previous letter, there is nothing onerous about plaintiffs' demands. In total, plaintiffs posed 8 interrogatories and 4 requests for documents (compared with the City's 20 interrogatories and 21 document requests).

Third, the City has not suggested that providing the requested discovery would prejudice their defense in any way (and, as plaintiffs have set forth in their previous letter, the discovery requested may be relevant to the plaintiffs' response to the City's proposed motion).

Finally, to the extent that the City raises the claim that plaintiffs are seeking "embarrassing" information by asking for disciplinary records and CCRB records, the undersigned has specifically told the City's attorney that those particular requests could be responded to at a later date, if necessary, and under a non-disclosure agreement.

Respectfully submitted,

DILLON HOROWITZ & GOLDSTEIN LLP

/s/

Michael Goldstein (4884)

MG:yg

cc.

**VIA ECF**

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